

Message

From: Kathleen M. Roberts [kroberts@lawbc.com]
Sent: 7/17/2019 4:32:47 PM
To: Hasan, Jafrul [Hasan.Jafrul@epa.gov]; Sheehan, Eileen [Sheehan.Eileen@epa.gov]; Sherlock, Scott [Sherlock.Scott@epa.gov]
CC: lbergeson@lawbc.com
Subject: NMP Producers Group - Response to EPA Request for Study Reports
Attachments: 00275070.pdf

Jarful, Eileen and Scott:

Appended is a letter from the N-Methylpyrrolidone (NMP) Producers Group in response to the e-mail request from the U.S. Environmental Protection Agency (EPA) that the NMP Producers Group voluntarily submit to EPA the following two unpublished study reports sponsored by the Group:

- NMP Producers Group (1999b). N-Methylpyrrolidone (NMP): Two generation reproduction toxicity study in Wistar rats – Administration in the diet. Department of Toxicology of BASF Aktiengesellschaft, Ludwigshafen, Germany, Project No. 70R0056/97008, unpublished report.
- NMP Producers Group (1999c). Two-generation reproduction toxicity study with N-Methylpyrrolidone (NMP) in Sprague-Dawley rats – Administration in the diet. Huntingdon Life Sciences, East Millstone, NJ, USA, Project No.: 97-4106, unpublished report.

This letter puts forward our position that EPA can and should protect these study reports as confidential business information if the NMP Producers Group members agree to voluntarily submit them.

While I have and will continue to confer with my members on other approaches to address EPA's request while protecting my clients' data rights, I felt it was imperative that we provide this letter to document our position and provide the basis for our views.

KATHLEEN M. ROBERTS

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